

REMARKS/ARGUMENTS

The Office Action mailed November 1, 2005 has been reviewed and carefully considered. Claims 1-3, 5-11, and 13-16 are pending in this application, with claims 1, 5, 9, and 13 being the only independent claims. Claims 5-8 and 13-16 are allowed. Reconsideration of the above-identified application in view of the following remarks is respectfully requested.

Claims 1-3 and 9-11 stand rejected under 35 U.S.C. §103 as being unpatentable over Applicant's admission of Prior Art (AAPA) in view of U.S. Patent No. 5,946,629 (Sawyer) and further in view of U.S. Patent No. 6,389,276 (Brilla).

Independent claims 1 and 9 each recite "a short message addressed to a predetermined destination number is routed from the telecommunication terminal to the first short message service center", "routing the short message from the first short message service center to a converter component based on the predetermined destination number which refers to the converter component and which is in the numerical range of the mobile communication network", and "converting, in the converter component, the predetermined destination number of the short message into a second destination number that refers to the data network". According to the claimed invention, the predetermined destination number which is associated with the short message at the originating telecommunication terminal refers to the converter component.

The Examiner agrees that the admitted prior art fails to disclose, teach or suggest the steps of routing the short message and converting the predetermined destination number recited above. The Examiner also agrees that Sawyer fails to teach or suggest the step of converting the predetermined destination number. It is respectfully submitted that Sawyer also fails to teach or suggest "routing the short message from the first short message service center to

a converter component based on a predetermined destination number which refers to the converter component".

Sawyer relates to a telephone network providing for inter-network short message service (SMS) message transmissions (see col. 1, lines 8-10 of Sawyer). According to Sawyer, a cellular communications network includes a mobile switching center (MSC) 18 (col. 3, lines 12-15). The cellular network 10 is connected to other networks 20(1), 20(2), and 20(3) by the MSC 18 (col. 3, lines 15-21). The MSC 18 includes a message center 22 for receiving, storing, and forwarding SMS messages (col. 3, lines 31-34). The message center 22 is conventional and further includes an inter-network communication functionality (ICF) 28 (col. 3, lines 47-50). The ICF 28 converts between different message formats (col. 4, lines 3-6). For example, an SMS message generated by a mobile station may be converted by the ICF 28 and delivered as a fax over telephone network 20(1) or as an e-mail message over LAN/WAN 20(2/3) (col. 3, lines 56-61). As shown in Figs. 2C and 2D, the SMS message delivered to the message center includes a destination network and address (col. 4, lines 48-67).

The Examiner alleges that the message center 22 is the first short message service center and that ICF 28 is the converter component. The ICF 28 is part of the message center 22 and both of these components are part of the MSC 18 (see col. 3, lines 28-28 and 47-52). Since the message is required to be routed to the MSC 18, and the MSC includes both the message center 22 and the ICF 28, there is no reason to separately refer to the ICF 28 in the predetermined destination number. Accordingly, Sawyer fails to disclose, teach or suggest "routing the short message from the first short message service center to a converter component based on a predetermined destination number which refers to the converter component", as is expressly recited in each of independent claims 1 and 9.

Brilla fails to teach or suggest what AAPA and Sawyer lack. Brilla relates to notifying a subscriber of the presence of a voice mail message in a voice mail system and has nothing to do with sending short messages. Accordingly, one skilled in the art would not combine the teachings of Brilla with Sawyer and the AAPA.

Even if the teachings of Brilla were combined with Sawyer and AAPA, Brilla still fails to teach or suggest the steps of "routing the short message from the first short message service center to a converter component based on the predetermined destination number which refers to the converter component" and "converting, in the converter component, the predetermined destination number of the short message into a second destination number that refers to the data network", as expressly recited in independent claims 1 and 9.

Brilla discloses a system 100 having a voicemail system 110 for storing voicemail messages for the subscriber of a telephone unit 104 (see col. 7, lines 8-10; and Fig. 2 of Brilla). A PBX 102 forwards an incoming call to voicemail system 110 upon detecting a busy/no answer condition at telephone unit 104 (col. 7, lines 15-17). After recording a message, voicemail system 110 sends a notification request for the called party to PBX 102 which sends a signal to telephone unit 104 causing a message waiting indication 113 to illuminate (col. 7, lines 23-30). Brilla also discloses a message platform 112 that enables a user of a digital telephone 122 to receive a notification message indicating storage of a message in the voicemail box (col. 7, lines 50-62). The message platform 112 generates a notification that a message is saved in the voicemail system 110 in response to a signal from the PBX 102 (see col. 9, lines 1-20).

Brilla fails to disclose a converter which converts a predetermined destination number of a short message. The Examiner alleges that the message platform 112 of Brilla is the claimed converter component. However, the message platform 112 does not convert "the

predetermined destination number of the short message into a second destination number that refers to the data network". Rather, the message platform generates a message to notify the user of the presence of a voicemail message. The address for the notification is determined using voicemail subscriber profile information (see col. 9, lines 14-18). Since Brilla discloses that the message platform 112 generates only a notification message, Brilla fails to teach or suggest (1) that a short message is routed "from the first short message service center to a converter component based on the predetermined destination number which refers to the converter component", or (2) converting the predetermined destination number of the short message into a second destination number that refers to the data network, as expressly recited in independent claims 1 and 9.

Brilla also fails to disclose, teach or suggest a short message addressed to a predetermined destination number that refers to the converter component, as recited in independent claims 1 and 9. Assuming *arguendo* that the message platform 112 of Brilla is considered to be a converter component, which is most assuredly not conceded, there is no disclosure, teaching or suggestion in Brilla of a message having a predetermined destination number that refers to the message platform 112. In contrast, Brilla discloses that the message platform 112 generates a notification message when a caller leaves a message for a subscriber of telephone unit 104 in the voice mail system 110. The generated notification message is sent to a digital phone of the subscriber, wherein the number of the digital phone is determined from subscriber profile information. The call to telephone unit 104 in Brilla has destination numbers directed only to the telephone unit 104. Accordingly, neither the originating call to telephone unit 104 nor the message generated by message platform 112 includes a predetermined

destination number that refers to a converter component, as expressly recited in independent claims 1 and 9.

In view of the above remarks, independent claims 1 and 9 should be allowed over AAPA in view of Sawyer and Brilla.

Dependent claims 2-3 and 10-11, each being dependent on one of independent claims 1 and 9, are deemed allowable for at least the same reasons as are independent claims 1 and 9, as well as for the additional recitations contained therein.

This application is now deemed to be in condition for allowance, and early notice to that effect is earnestly solicited.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

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Dated: January 31, 2006